

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) RASHONDA MCCLELLAN, Case No. 23-11197 Chapter 7
All Cases: Moving Creditor AMERIHOME MORTGAGE COMPANY, Date Case Filed 08/25/2023
LLC

Nature of Relief Sought: Lift Stay Annul Stay Other (describe)

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed

Chapter 7: No-Asset Report Filed on
 No-Asset Report not Filed, Date of Creditors Meeting 10/16/23

1. Collateral

a. Home
b. Car Year, Make and Model _____
c. Other (describe) _____

2. Balance Owed as of 10/04/23 \$ 94,450.05

Total of all other Liens against Collateral \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in all cases) \$ 80,000.00 per Debtor's Sched A/B

5. Default

a. Pre-Petition Default
Number of months 17 Amount \$ 12,108.14

b. Post-Petition Default
i. On direct payments to the moving creditor
Number of months _____ Amount \$ _____

ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

a. Lack of Adequate Protection § 362 (d)(1)
i. No insurance
ii. Taxes unpaid Amount \$
iii. Rapidly depreciating asset
iv. Other (describe) _____

b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. Other "Cause" § 362 (d)(1)

i. Bad Faith
ii. Multiple filings
iii. Other (describe)

d. Debtor's Statement of Intention regarding the Collateral

i. Reaffirm ii. Redeem iii. Surrender iv. No Statement of Intention filed Retain

Date: 10/16/23

/s/ Timothy R. Yuell

Submitted By